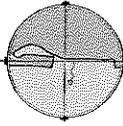


POINT RUSTON



5219 N. Shirley St., Suite 100
Tacoma, WA 98407

Phone: 253.752.2185
Fax: 253.752.7083

March 15, 2007

Mr. Kevin L. Rochlin
Remedial Project Manager
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, ECL-111
Seattle, WA 98101

RE: Monthly Report: No. 129, February 2007
Operable Unit No. 02
Asarco Tacoma Smelter Site

Dear Mr. Rochlin:

Point Ruston is submitting this monthly report per the requirements of paragraph 48 of the Consent Decree for the above referenced site. Point Ruston will continue to provide monthly reports to EPA for the site organized in the same manner as previous reports prepared by Asarco to follow item (a) through (g) of this paragraph.

If you have any questions, please call me.

Sincerely,

Sue O'Neill
Development Project Manager

Attachment (4 copies)

cc: Chung Ki Yee - Washington Department of Ecology
Doug Holsten - CH2MHill (2 copies)
Richard Kauffman - ATSDR c/o U.S. EPA Region 10
Leslie Ann Rose - Citizens for a Healthy Bay

Monthly Report No. 129, February 2007

Operable Unit 02

Asarco Tacoma Smelter Site

A. Actions taken to achieve compliance with the Consent Decree during the previous month.

1. A regular monthly design review meeting was not held in February.
2. Amendments to Asarco's final Upland Remediation Design (September 2006) are being prepared consistent with the Second Amendment to the Consent Decree.
3. Remedial Action activities continued.

B. Summary of sampling, tests, and all other data received or generated by Point Ruston in the previous month.

1. Outfall activities including the following:

Section 2.3 of the Final Statement of Work (SOW) for Remedial Design and Remedial Action – Exhibit F to the Second Amendment requires Point Ruston to continue outfall monitoring. Outfalls will be monitored to determine if the monthly average surface water outfall concentrations for arsenic, copper, and zinc exceed 0.5 ppm at the North and South site outfalls until they are abandoned.

Weekly composite samples will be collected at each outfall during the construction season. During the winter season, outfall samples will be collected every other month. Asarco began the following schedule in May of 2003 which Point Ruston will continue to implement: weekly composite samples will be collected from May-October, and in December, February, and April. Results for samples collected in February will be included in the March monthly report.

2. Point Ruston collects OCF leachate in a 5,000 gallon polyethylene tank for offsite shipment and disposal. LCRS and LDCRS volumes are monitored weekly in accordance with the draft OCF OMMP. LCRS volumes currently average approximately 209 gallons per day on the LCRS. Point Ruston shipped 4,400 gallons of hazardous leachate (5.25 ppm results attached) on February 20, 2007.
3. Point Ruston completes air monitoring at the perimeter of Stack Hill during stack base demo operations. Results of samples collected through February 23rd are attached. There were no exceedances.

C. Work Plans and other deliverables completed and submitted during the previous month.

1. No comments were received from EPA during the month of February.
2. Remedial Action during February included the following tasks:
 - OCF construction activities:
 - Maintained leachate collection system and shipped leachate for offsite treatment as necessary to maintain adequate storage capacity in the temporary storage tank.

Monthly Report No. 129, February 2007

Operable Unit 02

Asarco Tacoma Smelter Site

- Stack Hill construction activities:
 - Maintained erosion and surface water controls
 - Continued stack demolition which began on January 29th
- Site Capping construction activities:
 - Maintained subgrade areas at the site
- Site-wide remediation activities:
 - Continued surface water controls
 - Maintained haul roads and stockpiles onsite
- Sediment Capping activities:
 - Completed placement of sediment cap using material from the Port of Tacoma's Blair Waterway dredging project.

D. Actions scheduled for the next six weeks.

1. Point Ruston does not expect to receive comments from EPA on any submittals at this time.
2. The following Remedial Action tasks are planned to continue:
 - RA Monitoring:
 - Outfall sampling (weekly composite samples) during scheduled months
 - OCF construction activities:
 - Continue collection of leachate for offsite disposal
 - Continue monitoring of leachate volumes
 - Stack Hill construction activities:
 - Erosion controls and site maintenance
 - Continue removal of stack foundation
 - Continue air monitoring
 - Site Capping construction activities:
 - Continue to maintain subgrade areas at the site
 - Site-wide construction activities:
 - Continue surface water controls
 - Maintain roads and stockpiles onsite

E. Percentage completion, unresolved delays encountered or anticipated that may affect schedule, and efforts to mitigate delays.

1. Point Ruston Final Remediation Design is approximately 85% complete.

F. Modifications to work plans or schedules proposed to or approved by EPA.

1. The Second Amendment to the Consent Decree was finalized and the sale of the property to Point Ruston LLC completed on October 31, 2006.
2. Point Ruston will submit a schedule to EPA for preparation of addenda to the remedial design prepared by Asarco in accordance with paragraph 30a of the Second Amendment.

Monthly Report No. 129, February 2007

Operable Unit 02

Asarco Tacoma Smelter Site

G. *Activities undertaken to support Community Relations Plan during the previous month and planned for the next four weeks.*

1. Point Ruston attends the Town of Ruston's Town Council meetings routinely to answer question or give briefings regarding the status of RA and development planning activities (1st and 3rd Monday of each month).
2. Point Ruston is working with the City of Tacoma on development plans which incorporate remediation components for the site.
3. Point Ruston is working with MetroParks to incorporate the capping component into the Peninsula Park design.
4. Point Ruston meets with the Town of Ruston, City of Tacoma and MetroParks to address operation, maintenance, and monitoring issues at the site.



LABORATORY ANALYTICAL REPORT

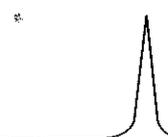
Client: Point Ruston LLC
Project: Tacoma Smelter, OCF Leachate
Lab ID: B07020304-001
Client Sample ID: TSM 020705

Report Date: 02/14/07
Collection Date: 02/05/07 13:30
Date Received: 02/06/07
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	5.25	mg/L		0.005		E200.8	02/13/07 13:57 / sas

Report RL - Analyte reporting limit.
Definitions: QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



SPECTRA Laboratories

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02/08/2007

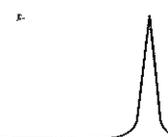
Point Ruston
5219 N. Shirley St.,
Suite 100
Tacoma, WA 98407

Project: 07-101
Date Received: 02/06/2007
Spectra Project: 2007020063

<u>Client ID</u>	<u>Spectra #</u>	<u>Analyte</u>	<u>Result</u>	<u>Units</u>	<u>Method</u>	<u>Matrix</u>	<u>Date Sampled</u>
012907-181	1	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	01/29/2007
012907-123	2	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	01/29/2007
012907-719	3	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	01/29/2007
013007-181	4	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	01/30/2007
013007-123	5	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	01/30/2007
013007-719	6	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	01/30/2007
013107-123	7	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	01/31/2007
013107-181	8	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	01/31/2007
013107-719	9	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	01/31/2007
020107-181	10	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	02/01/2007
020107-123	11	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	02/01/2007
020107-719	12	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	02/01/2007
020207-181	13	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	02/02/2007
020207-123	14	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	02/02/2007

SPECTRA LABORATORIES


Steve Hibbs, Laboratory Manager
a8/sgb



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02/08/2007

Point Ruston
5219 N. Shirley St.,
Suite 100
Tacoma, WA 98407

Project: 07-101
Date Received: 02/06/2007
Spectra Project: 2007020063

<u>Client ID</u>	<u>Spectra #</u>	<u>Analyte</u>	<u>Result</u>	<u>Units</u>	<u>Method</u>	<u>Matrix</u>	<u>Date Sampled</u>
020207-719	15	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	02/02/2007

SPECTRA LABORATORIES



Steve Hibbs, Laboratory Manager

a8/sgb

POINT RUSTON, LLC

5219 N. Shirley St., Suite 100
Phone: 253-752-2185

Tacoma, WA 98407
Fax: 253-752-7083

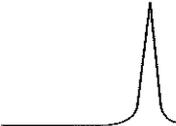
CHAIN OF CUSTODY RECORD

PROJ. NO		PROJECT NAME					NO. OF CONTAINERS	REMARKS				
07-101		POINT RUSTON										
SAMPLERS: (Signature) <i>[Signature]</i>												
DATE	STA #	TIME	COMP	GRAB	SAMPLE NUMBER							
1/29/07	49T				012907-181							
1/29/07	COURT				012907-123					Please call Sue O'Neill 752- 2185 2185 ext 240 w/ questions. STD TAT.		
1/29/07	Comm.				012907-719							
1/30/07	49T				013007-181							
1/30/07	COURT				013007-123							
1/30/07	Comm				013007-719							
1/31/07	49T				013107-123							
1/31/07	COURT				013107-181							
1/31/07	Comm				013107-719							
2/1/07	49T				020107-181							
2/1/07	COURT				020107-123							
2/1/07	Comm				020107-719							
2/2/07	49T				020207-181							
2/2/07	COURT				020207-123							
2/2/07	Comm				020207-719							

Relinquished (Signature) <i>[Signature]</i>	Date/Time 1200 / 2/2/2007	Received by: (Signature) <i>[Signature]</i>	Lab	Shipped via: FedEx, UPS or Other _____ Air Bill # _____
Relinquished (Signature) <i>[Signature]</i>	Date/Time 2/5/07 1600	Received by: (Signature) <i>[Signature]</i>	Remarks	
Relinquished (Signature)	Date/Time	Received for Laboratory by: (Signature)	Date/Time	Enclosed: <input type="checkbox"/> Parameter List with DTLs <input type="checkbox"/> Cover Letter

Split Samples:
[] Accepted [] Declined

Signature _____



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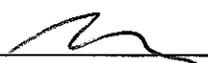
02/21/2007

Point Ruston
5219 N. Shirley St.,
Suite 100
Tacoma, WA 98407

Project: Point Ruston-Stack Base
Sample Matrix: Air
Date Sampled: 02/05/2007
Date Received: 02/13/2007
Spectra Project: 2007020182

<u>Client ID</u>	<u>Spectra #</u>	<u>Analyte</u>	<u>Result</u>	<u>Units</u>	<u>Method</u>
020507-719	1	Total Arsenic	< 2	ug/M3	SW846 6010B
020507-123	2	Total Arsenic	< 2	ug/M3	SW846 6010B
020507-181	3	Total Arsenic	< 2	ug/M3	SW846 6010B
020607-123	4	Total Arsenic	< 2	ug/M3	SW846 6010B
020607-181	5	Total Arsenic	< 2	ug/M3	SW846 6010B
020607-719	6	Total Arsenic	< 2	ug/M3	SW846 6010B
020707-123	7	Total Arsenic	< 2	ug/M3	SW846 6010B
020707-181	8	Total Arsenic	< 2	ug/M3	SW846 6010B
020707-719	9	Total Arsenic	< 2	ug/M3	SW846 6010B
020807-123	10	Total Arsenic	< 2	ug/M3	SW846 6010B
020807-181	11	Total Arsenic	< 2	ug/M3	SW846 6010B
020807-719	12	Total Arsenic	< 2	ug/M3	SW846 6010B
020907-123	13	Total Arsenic	< 2	ug/M3	SW846 6010B
020907-181	14	Total Arsenic	< 2	ug/M3	SW846 6010B
020907-719	15	Total Arsenic	< 2	ug/M3	SW846 6010B

SPECTRA LABORATORIES



Steve Hibbs, Laboratory Manager

a7/scj

2007020182

POINT RUSTON, LLC

5219 N. Shirley St., Suite 100
Phone: 253-752-2185

Tacoma, WA 98407
Fax: 253-752-7083

CHAIN OF CUSTODY RECORD

PROJ. NO		PROJECT NAME					NO. OF CONTAINERS	REMARKS									
07-101		POINT RUSTON - Stack Base Demo															
SAMPLERS: (Signature)																	
Paul Mullens							As										
DATE	STA #	TIME	COMP	GRAB	SAMPLE NUMBER												
2/5/07	49T				020507-719												Please fax results to Sue O'Neill @ Point Ruston
2/5/07	COURT				020507-123												
2/5/07	COMM				020507-181												
2/6/07	49T				020607-123												
2/6/07	COURT				020607-181												
2/6/07	COMM				020607-719												
2/7/07	49T				020707-123												
2/7/07	COURT				020707-181												
2/7/07	COMM				020707-719												
2/8/07	49T				020807-123												
2/8/07	COURT				020807-181												
2/8/07	COMM				020807-719												
2/9/07	49T				020907-123												
2/9/07	COURT				020907-181												
2/9/07	COMM				020907-719												

Relinquished (Signature)	Date/Time	Received by: (Signature)	Lab	Shipped via: FedEx, UPS or Other _____ Air Bill # _____
<i>[Signature]</i>	2/13/07 08:25	<i>[Signature]</i>		
Relinquished (Signature)	Date/Time	Received by: (Signature)	Remarks	
<i>[Signature]</i>	2/13/07 12:00	<i>[Signature]</i>		
Relinquished (Signature)	Date/Time	Received for Laboratory by: (Signature)	Date/Time	Enclosed: <input type="checkbox"/> Parameter List with DTLs <input type="checkbox"/> Cover Letter

Split Samples:
 Accepted Declined _____
 Signature _____



SPECTRA Laboratories

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03/02/2007

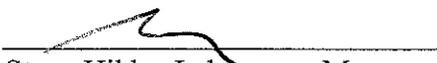
MAR 5 2007

Point Ruston
5219 N. Shirley St.,
Suite 100
Tacoma, WA 98407

Project: Point Ruston/07-101
Sample Matrix: Air Cassette
Date Sampled: 02/12/2007
Date Received: 02/20/2007
Spectra Project: 2007020281

<u>Client ID</u>	<u>Spectra #</u>	<u>Analyte</u>	<u>Result</u>	<u>Units</u>	<u>Method</u>
021207-181	1	Total Arsenic	<2	ug/M3	SW846 6010B
021207-123	2	Total Arsenic	<2	ug/M3	SW846 6010B
021207-719	3	Total Arsenic	<2	ug/M3	SW846 6010B
021307-181	4	Total Arsenic	<2	ug/M3	SW846 6010B
021307-719	5	Total Arsenic	<2	ug/M3	SW846 6010B
021307-123	6	Total Arsenic	<2	ug/M3	SW846 6010B
021407-123	7	Total Arsenic	<2	ug/M3	SW846 6010B
021407-181	8	Total Arsenic	<2	ug/M3	SW846 6010B
021407-719	9	Total Arsenic	<2	ug/M3	SW846 6010B
021507-123	10	Total Arsenic	<2	ug/M3	SW846 6010B
021507-181	11	Total Arsenic	<2	ug/M3	SW846 6010B
021507-719	12	Total Arsenic	<2	ug/M3	SW846 6010B
021607-123	13	Total Arsenic	<2	ug/M3	SW846 6010B
021607-181	14	Total Arsenic	<2	ug/M3	SW846 6010B
021607-719	15	Total Arsenic	<2	ug/M3	SW846 6010B

SPECTRA LABORATORIES



Steve Hibbs, Laboratory Manager

a7/scj

2007020281

POINT RUSTON, LLC

5219 N. Shirley St., Suite 100
 Phone: 253-752-2185

Tacoma, WA 98407
 Fax: 253-752-7083

CHAIN OF CUSTODY RECORD

PROJ. NO		PROJECT NAME					NO. OF CONTAINERS	REMARKS				
07-101		POINT RUSTON										
SAMPLERS: (Signature)							AS					
<i>Paul Mulvey</i>												
DATE	STA #	TIME	COMP	GRAB	SAMPLE NUMBER							
2/12/07	49T				021207-181	1	X					
2/12/07	COURT				021207-123						Please fax results to Sue O'Neill @ Point Ruston. Thank you.	
2/12/07	COMM				021207-719							
2/13/07	49T				021307-181							
2/13/07	COURT				021307- 181 719							
2/13/07	COMM				021307-123							
2/14/07	49T				021407-123							
2/14/07	COURT				021407-181							
2/14/07	COMM				021407-719							
2/15/07	49T				021507-123							
2/15/07	COURT				021507-181							
2/15/07	COMM				021507-719							
2/16/07	49T				021607-123							
2/16/07	COURT				021607-181							
2/16/07	COMM				021607-719							

MAR 5 2007

Relinquished (Signature) <i>Paul Mulvey</i>	Date/Time 2-19-07 0815	Received by: (Signature) <i>Sue O'Neill</i>	Lab	Shipped via: FedEx, UPS or Other _____ Air Bill # _____
Relinquished (Signature) <i>Sue O'Neill</i>	Date/Time 2-20-07 1250	Received by: (Signature) <i>Yours</i>	Remarks	
Relinquished (Signature)	Date/Time	Received for Laboratory by: (Signature)	Date/Time	Enclosed: <input type="checkbox"/> Parameter List with DTLs <input type="checkbox"/> Cover Letter

Split Samples:
 Accepted Declined _____
 Signature _____



SPECTRA Laboratories

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03/14/2007

Point Ruston
5219 N. Shirley St.,
Suite 100
Tacoma, WA 98407

Project: 07-101
Sample Matrix: Air Cassette
Date Sampled: 02/19/2007
Date Received: 02/27/2007
Spectra Project: 2007020416

<u>Client ID</u>	<u>Spectra #</u>	<u>Analyte</u>	<u>Result</u>	<u>Units</u>	<u>Method</u>
021907-123	1	Total Arsenic	<2	ug/M3	SW846 6010B
021907-181	2	Total Arsenic	<2	ug/M3	SW846 6010B
021907-719	3	Total Arsenic	<2	ug/M3	SW846 6010B
022007-123	4	Total Arsenic	<2	ug/M3	SW846 6010B
022007-181	5	Total Arsenic	<2	ug/M3	SW846 6010B
022007-719	6	Total Arsenic	<2	ug/M3	SW846 6010B
022107-123	7	Total Arsenic	<2	ug/M3	SW846 6010B
022107-181	8	Total Arsenic	<2	ug/M3	SW846 6010B
022107-719	9	Total Arsenic	<2	ug/M3	SW846 6010B
022207-123	10	Total Arsenic	<2	ug/M3	SW846 6010B
022207-181	11	Total Arsenic	<2	ug/M3	SW846 6010B
022207-719	12	Total Arsenic	<2	ug/M3	SW846 6010B
022307-123	13	Total Arsenic	<2	ug/M3	SW846 6010B
022307-181	14	Total Arsenic	<2	ug/M3	SW846 6010B
022307-719	15	Total Arsenic	<2	ug/M3	SW846 6010B

SPECTRA LABORATORIES



Steve Hibbs, Laboratory Manager

u7/scj

2007020416

ASARCO Consulting, Inc.

FROM

CHAIN OF CUSTODY RECORD

5219 North Shirley St, Suite 100, Ruston, WA 98407 (253) 752-1470 FAX (253) 752-7663

PROJ. NO		PROJECT NAME				NO. OF CONTAINERS	REMARKS																
07-101		POINT RUSTON																					
SAMPLERS: (Signature)												NO. OF CONTAINERS		REMARKS									
[Signature]																							
DATE	STA #	TIME	COMP	GRAB	SAMPLE NUMBER																		
1	2/19/07	49T			021907-123	1	X																
2	2/19/07	COURT			021907-181																		
3	2/19/07	COMM			021907-719																		
4	2/20/07	49T			022007-123																		
5	2/20/07	COURT			022007-181																		
6	2/20/07	COMM			022007-719																		
7	2/21/07	49T			022107-123																		
8	2/21/07	COURT			022107-181																		
9	2/21/07	COMM			022107-719																		
10	2/22/07	49T			022207-123																		
11	2/22/07	COURT			022207-181																		
12	2/22/07	COMM			022207-719																		
13	2/23/07	49T			022307-123																		
14	2/23/07	COURT			022307-181																		
15	2/23/07	COMM			022307-719																		
Relinquished (Signature)			Date/Time			Received by: (Signature)			Lab			Shipped via: FedEx, UPS or Other _____ Air Bill # _____											
[Signature]			2/26/07 08:30			[Signature]																	
Relinquished (Signature)			Date/Time			Received by: (Signature)			Remarks														
[Signature]			2/27/07 12:45			[Signature]																	
Relinquished (Signature)			Date/Time			Received for Laboratory by: (Signature)			Date/Time			Enclosed: <input type="checkbox"/> Parameter List with DTLs <input type="checkbox"/> Cover Letter											
Split Samples: <input type="checkbox"/> Accepted <input type="checkbox"/> Declined												Signature											

(MED) MAR 14 2007 14:45/ST. 14:44/NO. 6926759180 P 2